

POLREP #4
VALLEY FORGE NATIONAL HISTORICAL PARK ASBESTOS SITE
RTE 23 & GULPH RD
VALLEY FORGE, MONTGOMERY COUNTY, PA 19482
ATTN: RRC, CHARLIE KLEEMAN
CC: EARL CRAM, NATIONAL PARK SERVICE

EVENT: EMERGENCY RESPONSE/SITE ASSESSMENT

I. SITUATION (AS OF 1930 HOURS, FRIDAY, 23 MAY 1997)

- A. A PORTION OF VALLEY FORGE (VF) NATIONAL PARK WAS THE SITE OF AN ASBESTOS MANUFACTURING OPERATION PRIOR TO BEING DONATED TO THE PENNSYLVANIA PARK COMMISSION. THE NATIONAL PARK SERVICE (NPS) ASSUMED ADMINISTRATION OF THE PARK IN 1976. AREAS OF THE PARK IN WHICH EXPOSED ASBESTOS HAVE BEEN IDENTIFIED ARE ASSOCIATED WITH OLD ASBESTOS DISPOSAL PITS IN CLOSED QUARRIES ON VF NATIONAL PARK PROPERTY. ADDITIONALLY, AREAS ALONG AN ASBESTOS-CONTAINING MATERIAL (ACM) SLURRY PIPELINE ARE CONTAMINATED WITH ACM SLURRY MATERIAL. SAMPLING OF THE EXPOSED MATERIALS BY NPS HAS CONFIRMED THE PRESENCE OF ASBESTOS. ACCORDING TO VF NPS EMPLOYEES, THE BUILDINGS WHERE ASBESTOS OPERATIONS TOOK PLACE WERE DEMOLISHED AND BURIED IN AT LEAST 3 QUARRIES.
- B. BASED ON OBSERVATIONS DURING A JOINT INSPECTION OF THE VF NATIONAL PARK CONDUCTED BY OSC KOOB, AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY (ATSDR) REPRESENTATIVE CHARLES WALTERS, AND VF NPS OFFICIALS, THE OSC DETERMINED THAT THE SITE CONDITIONS MET THE CRITERIA OF AN EMERGENCY REMOVAL ACTION. PURSUANT TO DELEGATION OF AUTHORITY 14-1-A, THE OSC OBLIGATED \$200,000 TO INITIATE AN EMERGENCY REMOVAL ACTION TO STABILIZE AND, WHERE APPROPRIATE, DISPOSE OF HAZARDOUS SUBSTANCES (ACM) AT THE SITE.
- C. PERSONNEL ON SITE: EPA-1, VFNPS-1, SATA-2, ERCS-9
- D. WEATHER: SUNNY AND MILD, TEMPERATURES IN THE LOW 70'S.

II. ACTIONS TAKEN

- A. ERCS CONTINUED STABILIZATION EFFORTS IN AREAS IDENTIFIED WITH EXPOSED ASBESTOS AND AS MOST ACCESSIBLE BY PUBLIC. ACM AREAS WERE PRIORITIZED ACCORDING TO ABOVE CRITERIA. ERCS CONTINUED INSTALLATION OF HIGH-VISIBILITY SNOW FENCING AND CONTINUED WETTING EXPOSED ACM AREAS IDENTIFIED AS HIGH PRIORITY ALONG COUNTY LINE ROAD. A TOTAL ESTIMATE OF 6000 FEET OF SNOW FENCING HAS BEEN INSTALLED BY ERCS TO DATE.
- B. ERCS COVERED THE FIBER OPTIC PILE NEAR THE AMPHITHEATER WITH VISQUENE TO BETTER STABILIZE THE ASBESTOS-CONTAMINATED PILE.
- C. NPS HAZARDOUS MATERIALS ADVISOR ERNIE RALSTON ON SITE; NPS RALSTON ADVISED VALLEY FORGE PARK OFFICIALS ON PLANNING AND PREPAREDNESS ISSUES CONCERNING THE EXPOSED

ASBESTOS.

- D. SATA CONTACTED SELLA BURCHETTE OF EPA ERT; SATA DISCUSSED PERSONAL AIR SAMPLING METHODS FOR ASBESTOS. ERT BURCHETTE RECOMMENDED NIOSH METHOD 7402.
- E. NPS CRAM RECEIVED ANALYTICAL DATA ON THE ADDITIONAL SAMPLE NEAR THE MAINTENANCE FACILITY; ASBESTOS WAS NOT DETECTED.

III. FUTURE ACTIONS

- A. ERCS TO CONTINUE WETTING, FENCING, AND BANNER GUARDING OPERATIONS IN AREAS OF CONCERN
- B. ERCS TO BEGIN INSTALLATION OF POLY SHEETING COVER IN AREAS OF SIGNIFICANTLY EXPOSED ACM.
- C. SATA TO CONTINUE HISTORICAL RESEARCH IN PREPARATION FOR EXTENT OF CONTAMINATION STUDY.
- D. SATA TO PREPARE FOR ADDITIONAL AIR AND PERSONAL SAMPLING FOR ASBESTOS.
- E. ERCS TO IDENTIFY MICRO AREAS OF CONCERN AND DEVELOP A SHORT-TERM STABILIZATION PLAN FOR EACH AREA.
- F. ERCS RM TO INVESTIGATE ASBESTOS-CONTAMINATED SOIL DISPOSAL OPTIONS
- G. ALL PUBLIC RELEASES TO BE COORDINATED THROUGH UNIFIED COMMAND, INCLUDING OSC KOOB, NPS, AND STATE REPRESENTATIVES.

F. KEVIN KOOB, OSC
U.S. EPA REGION III
PHILADELPHIA, PA 19107